



Setting Standards for Excellence

VIA ELECTRONIC MAIL

January 7, 2011

Attn: Ms. Carole Cifrino
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

Dear Ms. Cifrino:

On behalf of the National Electrical Manufacturers Association's (NEMA) Signaling, Protection and Communication Section, I am writing to express concern regarding the Maine Department of Environmental Protection's plan ("*Implementing Product Stewardship in Maine*") for implementing additional product stewardship measures.

NEMA member companies produce life safety products and equipment, including smoke detectors. Manufacturers of these devices strive to be responsible corporate citizens committed to good stewardship of the environment and public health. There currently are many industry programs and policies in place that are designed to incorporate, to the greatest extent possible, environmentally conscious design of products and/or to deal with the proper reuse, recycling or disposal of such products at the end of life.

We are troubled by the inclusion of smoke detectors in the list of "Other HHW" targeted for possible product stewardship programs. NEMA does not believe that smoke detectors should be classified as household hazardous waste, nor do we feel smoke detectors meet the five criteria outlined in Maine's product stewardship law (LD 1631) for recommending product stewardship measures. Therefore, NEMA respectfully urges the Joint Standing Committee on Natural Resources to refrain from pursuing such programs for smoke detectors.

NEMA is the leading trade association of choice for the electrical and medical imaging equipment manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., NEMA's approximately 450 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity. These products are used in utility, medical imaging, industrial, commercial, institutional, and residential applications and include life safety devices such as smoke and carbon monoxide detection and notification devices.

If you have any questions regarding these concerns, please contact Sarah Owen at (703) 841-3245 or via email at sarah.owen@nema.org.

Respectfully,

Kyle Pitsor
Vice President, Government Relations

cc: Members of the Joint Standing Committee on Natural Resources